

1 professional background. Let's start with your college
2 experience, following with your work experience, and bring
3 us to your present position. As I understand it, you wear
4 three hats. And if I'm reading your vitae correctly --
5 well, not the vitae, but the job description correctly, you
6 are the director of curriculum and instruction, you are also
7 Title I project director, as well as the supervisor of
8 district-wide reading programs; is that correct?

9 A. Yes.

10 Q. So you wear three separate hats; is that a fair
11 characterization of your work description?

12 A. Yes.

13 Q. Okay. Let's come forward, please. If you might,
14 start with your college experience, your academic
15 experience, and come forward.

16 A. Okay. I graduated from Indiana University of
17 Pennsylvania with a degree in elementary education. I have
18 a master's, and a reading specialist, and a reading
19 supervision certificate from Clarion University. And I also
20 have my superintendent letter from Westminster.

21 This is my 33rd year in public education. This is
22 my seventh year at Crawford Central. My fourth year as
23 director of elementary curriculum.

24 Q. Okay. And you taught prior to assuming your
25 administrative position.



1 A. Yes.

2 Q. And I just want to be clear for the record, you
3 taught -- where did you teach?

4 A. I taught in Titusville Area School District. And
5 I was also --

6 Q. How long did you teach there?

7 A. I taught for 20 -- I was in Titusville for 26
8 years, nine of which I was the reading supervisor. And I
9 taught previous to that in the School District.

10 Q. Now, in the course of your responsibilities here,
11 you sit on the selection personnel committee; don't you?

12 A. I am part of the interview process, yes.

13 Q. And do you advise, typically, the rest of the
14 composition of the members who sit on those committees? I'm
15 referring to a selection of teacher's selection committees,
16 for the composition of administrators who sit on those
17 committees?

18 A. For the elementary selection, there are the
19 elementary principals, Mr. Heller, the assistant
20 superintendent, and myself.

21 Q. And what about the teachers?

22 A. Not for the selection of teachers.

23 Q. So teachers are never represented on the
24 personnel -- what is the correct name for the committee --

25 A. Interview --

1 A. Yes. We do look at whether we have minorities in
2 the pool.

3 Q. And how do you go about that? And tell us -- feel
4 free to elaborate on this. How did the issue come to the
5 board and be put on the table, and what was the nature of
6 the discussion on the part of the committee?

7 A. When we are looking for candidates, we are out
8 looking for candidates who have diversity to add to our
9 teaching population. If we had candidates for the interview
10 process that had represented a minority, we would certainly
11 consider their qualifications as well.

12 Q. Was there, on any occasion -- when the committee
13 deliberated to pass upon batches of applicants, would there
14 be anything on the applications or in the portfolio that
15 would indicate the ethnicity, the race or background, or
16 national origin of the candidate that would be available to
17 the committee?

18 If the issue is coming to the committee and you
19 have a batch of applications and the committee wants to be
20 sensitive to whether we have minorities in this pool, right,
21 would there be anything in the application by which they
22 could identify the race, the ethnicity, the national origin
23 of the applicant?

24 A. On the application?

25 Q. Well, the application or any other supporting

1 Q. Right.

2 A. -- so I'm not sure what you mean by --

3 Q. Are these two different things that --

4 MR. KUHAR: Please let her finish.

5 A. I'm not sure, my answers have been all about the
6 interview process.

7 Q. Right. I understand that. Right. But I'm now
8 asking you, is there a screening committee which is separate
9 and apart from the interview committee?

10 A. Prior to the interview, there would be a group of
11 interview candidates that would be identified.

12 Q. And who performs that function?

13 A. It could be a variety of people.

14 Q. Like who? Would that be administrators?

15 A. They would be administrators.

16 Q. And who, typically? Would it be Mr. Heller,
17 Mr. Dolecki?

18 A. It could be Mr. Heller, Mr. Dolecki, the
19 elementary principals for an elementary position.

20 Q. And they would -- and if you don't know -- what
21 would be the name of that committee; would it be the
22 screening committee?

23 A. I don't know.

24 Q. It has no name?

25 A. I don't know.

1 Q. And by -- let me ask you this, then: I looked
2 at -- and that's what your answer is why she was not
3 interviewed more recently than 2000 --

4 A. That's not what you asked me, you asked me why she
5 wasn't hired.

6 Q. Right. Let me step back then, why she was not
7 interviewed -- extended the opportunity to be interviewed.

8 MR. KUHAR: Do you mean for the '05 --

9 MR. NICHOLS: 2005 --

10 MR. KUHAR: -- spring interviews.

11 MR. NICHOLS: -- '06.

12 Q. Yes. Would you like to address that, Ms. Good.

13 A. She was not part of the pool that we interviewed,
14 I can tell you that.

15 Q. That means her application was not selected to be
16 a part of that pool then, right?

17 A. Yes.

18 Q. She did, in fact, apply, so that means that her
19 application was not selected --

20 A. Right.

21 Q. -- to be included in the pool, right?

22 MR. KUHAR: To stick with the earlier language, it
23 wasn't identified. Right, it wasn't identified?

24 THE WITNESS: It wasn't identified.

25 MR. KUHAR: Just to stick with the terms.

1 she didn't do it because she felt she was already qualified,
2 did you hold that against her because she didn't take those
3 courses or follow your and Mr. Heller's proposed course of
4 action?

5 A. Did I personally hold that against her?

6 Q. Did the committee hold it against her?

7 A. I can't speak for the committee.

8 MR. KUHAR: There's no testimony that it went
9 before the committee.

10 A. It didn't come to the --

11 Q. That's what I'm saying, though, the screening, why
12 she was not invited for an interview.

13 MR. KUHAR: Identification.

14 Q. Yeah. Can you think of a reason why she didn't?

15 A. I can't tell you that, I don't know.

16 Q. Now, your colleague, Mr. Heller, testified
17 yesterday that because Ms. Wagner didn't follow your
18 proposed course of action here that he concluded that she
19 was no longer interested; did you also reach that
20 conclusion?

21 A. I believe that if she would have followed up on
22 what we suggested, it would make her a more viable
23 candidate.

24 Q. Did you also reach a conclusion, as Mr. Heller
25 testified, that he concluded that she was no longer

1 Wagner, you, and Mr. Heller discussed a proposed course of
2 action that she would take, including going to a website,
3 some other course of instruction, did you hear Mr. Heller
4 state to my client that she should look to teaching
5 opportunities at other school districts?

6 A. Yes. I would say that --

7 Q. All right. That's enough, yes.

8 A. -- he had suggested other school districts.

9 Q. Yes.

10 MR. KUHAR: Did you get all the answer?

11 COURT REPORTER: Yes.

12 MR. KUHAR: Okay.

13 Q. Now, we -- I'm doing the law business, we're
14 serious, all right. Okay. Also, do you recall having made
15 a similar proposal to a person named Terry Balsomo
16 (phonetic)? Now, Ms. Balsomo is not employed with the
17 District and is certainly not a member of the union. So
18 that's not an objection -- I mean, it shouldn't be an
19 objection. Terry Balsomo, is that name familiar to you?

20 A. I don't know Terry Balsomo.

21 Q. How about someone named Nickerbucker, Rebecca
22 Nickerbucker, N-I-C-K-E-R-B-U-C-K-E-R, last name?

23 A. What's the question?

24 Q. Do you recall having also made a similar proposal
25 to her -- a proposed course of action, instructions?

1 students, that's not out of my office. So students with
2 IEPs, I wouldn't know that information.

3 Q. Who would know that?

4 A. The director of special services.

5 Q. Who is that?

6 A. Mr. Herida (phonetic).

7 Q. And in your collaboration and consultations with
8 the director of special education, I bring -- again, I want
9 to revisit this concept of role models; do you find that
10 there's a need for role models for these students, this
11 group of students?

12 MR. KUCHAR: Objection, which one?

13 Q. Special needs.

14 A. You asked me if there was a need for students with
15 special needs to have role models.

16 Q. Yes.

17 A. All students need role models.

18 Q. How about minority students, that includes
19 minority students?

20 A. They need -- right, role models, yes.

21 Q. You say you have engaged to some extent a
22 community outreach program in your District, right?

23 A. I work -- yes, I work out in the community with
24 different groups.

25 Q. And with respect to the special needs students,

1 substitutes, okay, 2004, were there other occasions where
2 there has been an increased need, do you know, for
3 substitute teachers?

4 A. I'm not sure. I'm not sure I --

5 MR. KUHAR: I object to the question in that she
6 didn't mention anything about an increased need.

7 Q. I thought you said -- I thought you said along --

8 A. I said shortage of personnel.

9 Q. Shortage of personnel. But that would be
10 inclusive of substitute teachers; wouldn't it?

11 A. That's what I was talking about.

12 Q. That's what you were talking about, right, when
13 you said shortage of personnel.

14 A. Right.

15 Q. And being very specific, when you say "personnel",
16 you're saying substitute teachers, right?

17 A. On a day-to-day basis.

18 MR. NICHOLS: All right. That's all the
19 questions.

20 BY MR. NICHOLS:

21 Q. One last question, you are familiar with the
22 policy regarding the usage of those teachers who teach by
23 virtue of an emergency permit -- you are familiar with the
24 policy as it relates to -- there's certain conditions in
25 which they can be hired, right?